UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP − 6 2019

Robert Mancini
Project Manager, Refining Business Unit
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: August 7, 2019 Meeting and Presentation of the Revised Supplemental Field Sampling and
         Analysis Plan-Arthur Kill, Spa Spring Creek, and Woodbridge Creek, dated August 21, 2019
         Former Chevron Perth Amboy Facility
         Perth Amboy, Middlesex County, New Jersey
         EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of
Environmental Protection (NJDEP) have completed our review of the Revised Supplemental Field
Sampling and Analysis Plan (RSFSAP) dated August 21, 2019, submitted for the Former Chevron Perth
Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The August 2019 RSFSAP was
submitted by Chevron Environmental Management Company pursuant to the Resource Conservation
and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the
NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. EPA and NJDEP have provided
comments below. EPA and NJDEP also hereby approve the RSFSAP, effective the date of this letter,
under the condition that Chevron address comment #1 before commencing the field sampling.

1. In the Sediment Data Gap Analysis Spreadsheet, Under SED-19, a spot-check against Figures 3-5
    from the 2014 Supplemental Ecological Report revealed errors in the reported data in the new
    spreadsheet. For the samples taken at 6.0-6.5', the table reveals that BN, EPH, Metals, VOC, and
    ph/TOC/Grain Size samples were taken, but in fact only EPH and VOC data was taken. There was
    also data collected at the 4.0-4.5' interval that was not reported in the spreadsheet. The table also
    does not indicate whether Chevron will be taking samples at the 2.0-2.5' depth. The proposed
    samples are limited to the top 1.0'. Chevron should revise this spreadsheet with the appropriate
    reported data and clarify what new samples it will be taking.

2. In Revised Table 1 (August 2019), under column headings Historic Sample Depth and Historic
    Analysis, a spot-check revealed apparent errors. For 2002 sample SED-01-A, BN (SVOC) data
    should be indicated for the 0.0-0.5' interval, not 0.5-1.0' (see Figure 4 and Table 9-8). For 2002
    sample SED-05-B, EPH is indicated for the 0.5-1.0' interval, however EPH was not analyzed in 2002
    samples. Chevron should examine all historic information on Table 1 and revise as necessary.

3. The response to comments states, " Regarding the depth of proposed sampling, it should be noted
    that the biologically active zone, or benthic zone, is defined by the Department as 0-0.5 feet and
    would be of primary concern with respect to sediment impacts." Please clarify the intent of this
    statement. While data from the 0-0.5' interval may be used for specific components of the ecological

risk assessment (such as sediment toxicity texts or exposure dose calculations), full vertical and horizontal contaminant delineation is required. Moreover, sediment remedial actions are not limited to the biotic zone.

4. In response to the discrepancy in PAH concentrations noted by NJDEP at the August 7, 2019 meeting, it is stated that the higher PAH and EPH concentrations at upstream SED 9 vs SED 6 suggests a contaminant source other than the Chevron Facility refinery site. Data interpretation regarding source attribution is not appropriate for field sampling plan documents, and moreover, is premature since transects SED-23 and SED-24 will be newly sampled such that contaminant gradients and distribution between SED-06 and SED-09 can be evaluated in this tidal system.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,

Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)